

Approved,

/s/ Benita Y. Pearson on 7/12/2022

United States District Judge

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

Louis Jones,)	CASE NO. 4:22-cv-00138
Plaintiff,)	JUDGE BENITA Y. PEARSON
v.)	<u>STIPULATION REGARDING</u>
NMC Metals, Inc., dba Niles Expanded)	<u>INADVERTENT DISCLOSURE OF</u>
Metals,)	<u>ATTORNEY-CLIENT PRIVILEGE,</u>
Defendant.)	<u>WORK PRODUCT PROTECTION OR</u>
)	<u>OTHER APPLICABLE PRIVILEGE</u>

IT IS HEREBY STIPULATED to, between the parties, through their respective counsel, as follows:

- i. Any inadvertent disclosure or production of documents protected by the parties' attorney-client privilege, work product protection or other applicable privilege will not constitute a waiver of either any available privilege or protection by the disclosing party.
- ii. In the event that the receiving party discovers that it has received documents protected by the attorney-client privilege, work product protection or other applicable privilege, it will bring that fact to the attention of the producing party immediately upon discovery.
- iii. In the event that the producing party discovers that it has produced documents protected by the attorney-client privilege, work product protection or other

applicable privilege, it will bring that fact to the attention of the receiving party immediately upon discovery.

- iv. Upon request of the producing party, the receiving party will promptly return to the producing party any documents protected by the party's attorney-client privilege, work product protection or other applicable privilege and any copies that the receiving party may have made.
- v. Upon the request of the producing party, the receiving party will promptly disclose the names of any individuals who have read or have had access to the documents protected by the party's attorney-client privilege, work product protection or other applicable privilege.
- vi. No such inadvertently produced documents protected by the parties' attorney-client privilege, work product protection or other applicable privilege may be used in evidence against the producing party.
- vii. Attorney-client privilege and work product protection shall have the meanings as provided in FRE 502 (g) (1) and (2).

Stipulated by:

/s/David N. Truman

Attorney for Plaintiff

David N. Truman, #0082347

Stuart G. Torch, #0079667

EMPLOYMENT LAW PARTNERS, LLC

4700 Rockside Rd. Suite 530

Independence, Ohio 44131

Tel. 216-382-2500

Fax 216-381-0250

Email: david@employmentlawpartners.com
stuart@employmentlawpartners.com

/s/ Matthew M. Ries

Attorney for Defendant

Kevin P. Murphy, #0029747

Matthew M. Ries, #0083736

HARRINGTON, HOPPE & MITCHELL, LTD.

108 Main Avenue, S.W., Suite 500

Warren, OH 44481

Tel. 330-392-1541

² Fax 330-394-6890

Email: KMurphy@hhmlaw.com;
MRies@hhmlaw.com